SUBRECIPIENT MONITORING MANUAL

For Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Award Recipients

August 2018
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This document was prepared for the U.S. Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA), by Education Development Center, under HRSA contract number HHSH25020160001C.
About MIECHV

The Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) supports voluntary, evidence-based home visiting services for at-risk pregnant women and parents with young children up to kindergarten entry. The MIECHV Program builds upon decades of scientific research showing that home visits by a nurse, social worker, early childhood educator, or other trained professional during pregnancy and in the first years of a child’s life improve the lives of children and families by preventing child abuse and neglect, supporting positive parenting, improving maternal and child health, and promoting child development and school readiness. States, territories, and tribal entities receive funding through the MIECHV Program, and have the flexibility to select home visiting service delivery models that best meet state and local needs. The MIECHV Program is administered by the Health Resources and Services Administration (HRSA) in partnership with the Administration for Children and Families (ACF).

Introduction

The states, territories, and nonprofit organizations that receive federal funds to administer the MIECHV Program, known as award recipients, are responsible for overseeing the fiscal and program activities of the local agencies funded to carry out the MIECHV Program.

In accordance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards, 45 Code of Federal Regulations (CFR) Part 75, award recipients must:

- Effectively manage all subrecipients of MIECHV funding to ensure successful performance of the MIECHV Program
- Execute subrecipient agreements that incorporate all requirements for pass-through entities outlined in 45 CFR 75.352
- Develop and execute a subrecipient monitoring plan that meets all applicable federal requirements and supports high-quality subrecipient monitoring
- Conduct ongoing monitoring and oversight of subrecipients to, among other things, ensure (a) enrollment and retention of eligible families in home visiting services in at-risk communities, (b) implementation of home visiting models with fidelity, and (c) proper expenditure of funds

The Manual:

- Defines subrecipient monitoring
- Describes required aspects of subrecipient monitoring
- Helps awardees determine if an entity is a subrecipient or a contractor
- Describes what must be monitored
- Outlines a process for monitoring subrecipients, including the development and implementation of a subrecipient monitoring plan
- Incorporates examples of best practices for subrecipient monitoring
- Includes a checklist of monitoring practices that may assist award recipients in determining if subrecipient monitoring plans, policies, and procedures include all required elements
What Is Subrecipient Monitoring?

Subrecipient monitoring is a mechanism for overseeing the stewardship of federal funds for MIECHV Programs by verifying that funds are spent as mandated by MIECHV legislation and post-award requirements under 45 CFR Part 75 and in accordance with all applicable regulations. Subrecipient monitoring also ensures that programs offered by local implementing agencies (LIAs) are of high quality and meet the needs of eligible families, and that LIAs are demonstrating improvement on legislated benchmarks and performance measures.

Subrecipient monitoring activities must ensure that subrecipients:

- Comply with federal statutes and regulations
- Comply with terms and conditions of the subaward
- Use funds for authorized purposes
- Spend their award dollars in ways that are allowable, allocable, and reasonable

Who Is Required to Conduct Subrecipient Monitoring?

When an award recipient provides a subaward to another nonfederal entity to carry out part of a federal program, the award recipient becomes a pass-through entity. As pass-through entities, MIECHV program award recipients are responsible for the stewardship of the federal funds they pass along to their subrecipients. Within the MIECHV Program, award recipients engage with LIAs as subrecipients responsible for providing home visiting services as part of the federal award. Award recipients must have written policies and procedures for procurement and competition, for determining the qualifications of organizations, and for selecting...
subrecipients. They must have signed and dated written agreements with all entities selected to be subrecipients. Agreements must clearly define the nature of services to be provided, cost structures, and methods of service delivery. Awardees must also state that subrecipients will adhere to MIECHV Program and federal requirements.

Who Must Be Monitored?

MIECHV award recipients, as pass-through entities, are required to determine if the legal agreement with another nonfederal entity for disbursement of MIECHV funds establishes the party receiving the funds as a subrecipient or a contractor.

Figure 1 below lists the characteristics of subrecipients and contractors, and describes their relationship with award recipients. Award recipients must monitor entities that qualify as subrecipients. Entities that are characterized as contractors are not subject to subrecipient monitoring.

**Figure 1**

<table>
<thead>
<tr>
<th>Subrecipient—Federal Assistance Relationship</th>
<th>Contractor—Procurement Relationship</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>(Subject to Subrecipient Monitoring)</em></td>
<td><em>(Not Subject to Subrecipient Monitoring)</em></td>
</tr>
<tr>
<td>• Determines who is eligible to receive what federal assistance</td>
<td>• Provides goods and services within normal business operations</td>
</tr>
<tr>
<td>• Has performance measured in relation to whether objectives of a Federal program were met</td>
<td>• Provides similar goods or services to many different purchasers</td>
</tr>
<tr>
<td>• Is responsible for making programmatic decisions</td>
<td>• Normally operates in a competitive environment</td>
</tr>
<tr>
<td>• Adheres to applicable Federal program requirements specified in the Federal award</td>
<td>• Provides goods or services that are ancillary to the operation of the federal program</td>
</tr>
<tr>
<td>• Uses federal funds to carry out a program for a public purpose specified in the legislation</td>
<td>• Is not subject to federal program compliance requirements</td>
</tr>
</tbody>
</table>

Source: 45 CFR 75.351

The substance of the relationship is more important than the form of the agreement. If an award recipient defines agreements as contracts but the substance behind the agreement meets the definition of a subaward, the nonfederal entity receiving the funds is a subrecipient and is subject to subrecipient monitoring.

What Do Award Recipients Monitor?

**Program Requirements**

Award recipients are required to monitor subrecipients for compliance with federal requirements and performance expectations. To fulfill these requirements, award recipients review how subrecipients implement aspects of program implementation related to:

- Prioritizing high-risk populations identified in the legislation for enrollment in home visiting services, taking into account the staffing, community resources, and other requirements to operate at least one approved model of home visiting and demonstrate improvements for eligible families
- Implementing Continuous Quality Improvement (CQI)
- Fulflling performance measurement activities in accordance with HRSA-approved plans
- Reporting on key indicators associated with healthy development of children including systems outcome measures in the MIECHV performance measures
- Filling caseloads of family slots that could potentially be enrolled at any given time if the program were operating with a full complement of hired and trained home visitors
- Recruiting and retaining participants, including attrition rate and enrollment of eligible families
- Collaborating with early childhood partners
- Collecting and reporting on data that show contractual requirements have been met and that accurate and complete data have been submitted for required annual and quarterly reports
- Developing and implementing policies and procedures that ensure the effective provision of reflective supervision program-wide with fidelity to the model(s) implemented
- Following with fidelity an approved evidence-based home visiting service delivery model

**Fiscal Requirements**

Fiscal monitoring ensures compliance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (45 CFR 75). To this end, award recipients review the following of each subrecipient:

- Written fiscal policies and procedures for such elements as internal controls, accounts payable, purchasing, and reimbursements for travel and other expenses
- Documentation of expenditures to enable the award recipient to determine:
  - Whether the subrecipient reconciles budgeted expenditures to actual expenditures
  - Whether costs are allowable, reasonable, and allocable

**Important Documents**

The following documents provide the federal program and fiscal requirements—uniform Administrative Requirements—from the Department of Health and Human Services (HHS) and the Health Resources and Services Administration (HRSA).

- Cost Principles, and Audit Requirements for HHS Awards (45 CFR 75); 45 CFR 75.351, 45 CFR 75.352, and 45 CFR 75.521
- HHS Grants Policy Statement
- HRSA’s Notice of Funding Opportunity announcements (NOFO)
- Notice of Award (NOA)
» Whether expenses are supported by clear, complete, and detailed documentation

» Whether the subrecipient has followed the rules about limiting funds to support direct medical, dental, mental health, or legal services

- Single Audit Report (if applicable), conducted annually by an independent accounting firm in compliance with 45 CFR 75.500-521; or other audit, review, financial statements, or corrective action plan for any fiscal or other audit findings

- Records of employee time and effort, including:
  » Assurances that employees are tracking actual time spent on MIECHV rather than just reporting budgeted hours per day
  » Allocations of operating and/or other costs for employees who are not funded 100 percent by this program

- System for Award Management (SAM) registration for all subrecipients to ensure they have an active account with accurate information and are eligible to receive federal funding

- Timeliness of fiscal reporting

- Adherence to the federal record retention policy

### How Do Award Recipients Conduct Subrecipient Monitoring?

“Effective monitoring of MIECHV subrecipients by recipients includes on-site reviews, audits, and other forms of program monitoring and oversight that optimize enrollment and retention of eligible families in home visiting services in at-risk communities and ensure implementation of home visiting models with fidelity and proper expenditures of funds.”

The process for subrecipient monitoring includes the following:

- Determining relationships and setting clear expectations for subrecipients

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• Developing a subrecipient monitoring plan that includes establishing a monitoring team with the capacity to carry out the process

• Engaging in ongoing monitoring activities in accordance with the subrecipient monitoring plan

• Performing on-site visits

• Documenting findings established through ongoing monitoring and on-site visits, and monitoring for satisfactory corrective action

**Determining the Relationship and Setting Clear Expectations**

The first step in monitoring a subrecipient involves determining whether or not the entity being considered qualifies as a subrecipient. If it does, then the award recipient must ensure that the subaward contains all the requirements for pass-through entities that are specified in 45 CFR 75.352. If the subaward is greater than $25,000 the award recipient uses this information to report to the Federal Subaward Reporting System (FSRS), as required by the Federal Funding Accountability and Transparency Act (FFATA). The FFATA Subaward Reporting System—FSRS.gov—is the system that allows grant award and contract award recipients to electronically report their subaward activity.

In addition to making sure that executed agreements with subrecipients incorporate all elements of 45 CFR 75.352, the award recipient must clearly specify in the executed agreement with the LIA any additional reporting requirements that are particular to the relevant state, territory, or nonprofit organization.

To ensure the successful execution of a subaward, award recipients should provide training to subrecipients on how to adhere to federal statutes and regulations.

Award recipients should also include in the training the terms and conditions of the subaward and make clear to subrecipients that they must permit the award recipient to access their records and financial statements when needed.

**MIECHV Awardee Examples**

» Arkansas provides subrecipients with a document called “Performance-Based Deliverable Information,” which spells out required deliverables and how they will be monitored, describes key elements of acceptable performance, and lists completion dates.
» **Colorado** provides an orientation and training for subrecipients to review the requirements for federal grants management for MIECHV. The state also trains subrecipients’ fiscal, administrative, and supervisory staff in each community every year.

» **Florida** establishes collaborative relationships with subrecipients, emphasizing that the roles of award recipient and subrecipient are not adversarial, rather that the respective organizations are partners in achieving improved outcomes for children and families. Florida’s monitoring process conveys the valuable contribution of LIAs to the success of the Florida MIECHV Program. Florida’s MIECHV Initiative Provider Quality Assurance Monitoring Procedure Manual is updated annually.

**Developing a Subrecipient Monitoring Plan**

All award recipients must have a written plan that describes how they will effectively monitor subrecipients for compliance with federal program and fiscal requirements. The plan must include an evaluation of each subrecipient’s risk of noncompliance or nonperformance, identify the person(s) responsible for each monitoring activity, and include timelines for each monitoring activity.

Subrecipient monitoring plans should be designed to ensure that the subaward:

- Is used for authorized purposes
- Is used for allowable, allocable, and reasonable costs
- Is in compliance with federal statutes and regulations
- Is in compliance with the terms and conditions of the subaward; and
- Achieves applicable performance goals

Subrecipient monitoring plans must also include provisions for:

- Review of financial and performance reports as required by the award recipient in compliance with federal requirements
- Follow-up procedures to ensure timely and appropriate action by the subrecipient on all deficiencies identified through required audits, on-site visits, or other procedures pertaining to the federal award
- Issuance of a management decision for audit findings (as applicable) pertaining to the federal award and provided to the subrecipient as required by 45 CFR 75.521

The plan must also:

- Provide detailed information about what the award recipient will review regularly, how often that review will occur, and what the award recipient will examine during an on-site visit
- Explain the process for evaluating subrecipients’ risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward, and how monitoring activities may be enhanced based on risk assessments
Clearly define processes for maintaining documentation about ongoing monitoring activities and on-site visits, including findings and corrective action

List protocols for sharing the results of monitoring activities, including how findings of noncompliance will be resolved

Describe the process for ensuring that deficiencies are corrected

Itemize the possible remedies for noncompliance spelled out in 45 CFR 75.371 (including, but not limited to, temporarily withholding cash payments pending correction of the deficiency by the subrecipient; disallowing all or part of the cost of the activity or action not in compliance; wholly or partly suspending or terminating the subaward; or withholding further subawards)

**Engaging in Ongoing Monitoring Activities**

Monitoring must be ongoing and maintained through communication and collaboration. Ongoing monitoring allows subrecipients to make corrections before compliance issues emerge. MIECHV award recipients conduct ongoing subrecipient monitoring activities throughout the year in a variety of ways. Informal monitoring may include telephone conversations or email exchanges. Formal monitoring may include written reports and monthly or quarterly document reviews.

**MIECHV Awardee Examples**

» **Arkansas** regularly communicates about program and financial expectations through scheduled meetings where award recipients and subrecipients update each other. During meetings, the award recipient shares the latest changes in state or federal requirements and discusses what those changes mean in terms of a subrecipient's program and/or fiscal processes and responsibilities.

» **West Virginia** uses a checklist, which is completed cooperatively by monitoring and compliance staff, program staff, and grants management staff. Completing the activities as listed in the checklist and throughout the grant cycle ensures standardized and consistent oversight of subaward processes.

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**Subrecipient Monitoring Tip**

Determine who is on the subrecipient monitoring team.

The following questions will help determine members of a subrecipient monitoring team.

Identify the team member(s) who:

- Ensure that reporting requirements (e.g., the Payment Management System, FFR, and FFATA requirements) are completed
- Ensure that funds are used appropriately to implement the program and achieve desired outcomes
- Review and monitor the subrecipient’s fiscal practices over time
- Plan how funds are disseminated
- Determine the mechanisms for disseminating funds (e.g., contracts, grants)

**Subrecipient Monitoring Tip**

Develop and use a checklist to ensure consistency across all subrecipients and to let subrecipients know what you will be reviewing.
» Wisconsin holds quarterly meetings with subrecipients. These meetings provide an opportunity to build connections between subrecipients and the state team while also offering information and direction on program changes, peer-to-peer networking, and professional development opportunities.

» In Kansas, the program manager meets with each LIA team. During the meeting, team members report and discuss the program’s progress and challenges, including the number of families contacted and enrolled. Subrecipients are required to submit a semi-annual narrative program activity and progress report that addresses their contractual scope of work. LIAs submit required benchmarks and demographic and service-delivery data on a quarterly basis. The program manager or designated contracted technical assistance provider reviews the narrative and data reports and follows up to address any questions or concerns with individual LIAs.

Performing On-Site Visits

When performing on-site visits with a subrecipient, award recipients review how the subrecipient is meeting program and fiscal requirements. On-site visits include three components: pre-site visit activities, on-site activities during the visit, and post-site visit activities.

Pre-site Visit Activities: The visit should take place at a time that is convenient for the staff of the award recipient and subrecipient. The award recipient should let the subrecipient know in advance what to expect during the visit, who the members of the site visit team are, how much time the visit will take, and what information the subrecipient should make available for review during the visit. If used, a pre-site visit checklist should be shared with the subrecipient before the visit. Conducting a subrecipient self-assessment prior to the site visit often facilitates the visit.

The award recipient may also request from subrecipients documents to review before the site visit to establish in advance an in-depth understanding of each subrecipient’s organizational structure and operations.

Subrecipient Monitoring Tip

Use a proactive and positive approach.

Take time to build your relationship with your subrecipients. For example, consider conducting “getting to know you” site visits.
MIECHV Awardee Examples

» **Florida** schedules annual on-site visits with subrecipients well in advance of the visit and provides an agenda to all participants. Subrecipients also complete self-assessment monitoring tools prior to the visit. Florida invites all stakeholders to participate in on-site visits, including administrators, supervisors, home visitors, data support staff, and model developers.

» **Wisconsin** requires subrecipients to submit information to the state team in advance of the visit. This helps focus the agenda, which includes a review of the program’s data dashboard, accreditation status, and the strengths and challenges unique to each program.

**On-Site Visit Activities:** On-site visit activities include meetings, individual interviews with key subrecipient staff members, and documentation reviews. Since one of the key elements of subrecipient monitoring is assessing model fidelity, some recipients, such as **Florida** and **New York**, include representatives from model developers in their on-site visits. Other awardees choose to rely on reports from model developers to determine model fidelity.

All on-site visits should end with a debriefing, during which the award recipient shares the strengths and areas of need that are identified during the visit. The award recipient should immediately address any specific areas of noncompliance that will be addressed in the written report following the visit.

**MIECHV Awardee Examples**

» **Florida’s** on-site visit agenda includes:

  ° A case study presentation by a home visitor
  ° A discussion of implementation successes and challenges
  ° A review of MIECHV data on capacity and service utilization, staffing, and participant retention and program completion
  ° A self-assessment
  ° A document review, reflections, and a discussion of technical assistance needs
  ° The results of monthly and quarterly performance data, expenditure reviews, and monitoring activities during the on-site visit

» **Colorado** uses a fiscal site visit protocol. During the visit, state agency personnel review the following:

  ° Invoices for a given month, which are cross-checked with the general ledger and timesheets
º Internal controls
º Accounts payable policies and procedures
º Financial statements and the general ledger
º Statements of revenues and budgeted costs compared to actual costs for a 6-month period
º Policies and procedures for approving general expenses, reimbursing travel expenses, reimbursing cell phone charges, and allocating costs

- **Wisconsin's** on-site visit includes a review of LIA enrollment and capacity data. Wisconsin compares the number of families enrolled at a given point and the number of families served year to date with the subrecipients’ current contracted number of families to be served.

**Post-Visit Activities:** After the visit, award recipients should send to subrecipients a written report that documents strengths, areas in need of improvement, and areas of noncompliance discussed during the on-site visit.

If a corrective action plan (CAP) is needed, the award recipient should provide information about the format of the plan, actions required to address noncompliance, criteria for deeming actions successful, and the timeline for completion. Additionally, the CAP should include processes that will be implemented to prevent reoccurring noncompliance, along with follow-up activities that include technical assistance from the award recipient.

**MIECHV Awardee Examples**

- **Florida** provides the results of monitoring activities in writing following the on-site visit. All areas of noncompliance that affect program implementation, staff, and clients and that are identified but not corrected during the visit must be included in the CAP.

- **Arkansas** asks subrecipients to submit corrective action plans via an electronic system. The plans include steps needed to make changes and meet deliverables, person(s) responsible, resources or support needed (e.g., training, additional on-site visits), constraints that might inhibit completion, and expected due dates.
Awardee Subrecipient Monitoring Practices Checklist Overview

The questions in the checklist that follows may assist award recipients in developing policies, procedures, and monitoring plans; in addressing subrecipient monitoring requirements; and in identifying areas that need improvement.

How to Use This Tool

- The checklist includes 17 questions that require yes-or-no answers, followed by prompts for awardee recipients to respond to questions, assess current practices, and consider and list applicable documents.

- Each member of a subrecipient monitoring team can complete the yes-or-no portion of the checklist individually; then all members can come together to compare answers, describe current practices, and identify applicable documents.

- After compiling the results of the checklist, team members should be able to identify any areas that currently fail to meet requirements or that could be improved. From there, the team members can develop an action plan to revise their subrecipient monitoring plan and/or policies and procedures, and identify additional documents they need to develop. As always, naming the person(s) responsible and providing timelines for completion in the action plan represent effective practice.
## Awardee Subrecipient Monitoring Practices Checklist

<table>
<thead>
<tr>
<th>Check Question</th>
<th>Yes</th>
<th>No</th>
<th>Describe Your Practices What do you do to meet requirements?</th>
<th>Applicable Documents List your policies, desk audit procedures, tracking sheets, reports, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does your organization have a documented subrecipient monitoring plan that addresses fiscal and program oversight?</td>
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<td>2. Does your organization assess risk prior to awarding a subaward contract or agreement? What steps are included in your risk assessment?</td>
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<td>3. Does your organization have policies (including procurement, competition, and qualified organization selection policies) for selecting subrecipients and contractors?</td>
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<td>4. Do you have processes for assessing and determining whether an agreement defines a subrecipient or a contractor?</td>
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<td>5. Do you have processes for notifying all potential subrecipients that they must be registered in the System for Award Management in order to receive a subaward? How do you verify that they are registered?</td>
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<td>6. Do you have signed and dated written legal agreements with all subrecipients?</td>
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<td>Check Question</td>
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<td>7. Do your subrecipient agreements clearly define the nature of services to be provided, cost structure, and method of delivery; and do they adhere to MIECHV and other federal requirements?</td>
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<td>8. Does your subrecipient monitoring plan specify the nature and frequency of fiscal and program monitoring?</td>
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<td>9. Does your plan include processes for monitoring subrecipients’ programs?</td>
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<td>10. Do you have processes for monitoring subrecipients’ financial viability?</td>
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<tr>
<td>11. Are your subrecipients maintaining the appropriate supporting documentation for expenditures of the subaward? How do you verify this?</td>
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<tr>
<td>12. Do you review supporting documentation for subrecipients’ expenditures to ensure costs are allowable, allocable, and reasonable to the federal MIECHV awards?</td>
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<tr>
<td>13. Do you conduct on-site reviews of your subrecipients? Does your subrecipient monitoring plan describe the nature, frequency, and specific fiscal and program oversight performed during visits?</td>
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<td>14. Do you provide to your subrecipients training or technical assistance on the requirements, if applicable? How do you assess the need for additional oversight?</td>
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<tr>
<th>Yes</th>
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<td>List your policies, desk audit procedures, tracking sheets, reports, etc</td>
</tr>
<tr>
<td>Check Question</td>
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<td>-------------------------------------------------------------------------------</td>
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<tr>
<td>15. Do you have written policies and procedures for determining if your subrecipients have current audits, if applicable?</td>
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<tr>
<td>How often do you review your subrecipients’ audits and audit-related compliance?</td>
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<tr>
<td>16. Do you have processes for following up on subrecipient deficiencies and assessing corrective action?</td>
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<tr>
<td>17. Do you have processes for ensuring compliance with the Federal Funding Accountability and Transparency Act (FFATA)?</td>
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<tr>
<td>- What is the process for ensuring timely completion of the FFATA reports?</td>
</tr>
<tr>
<td>- How do you document and review your FFATA compliance?</td>
</tr>
</tbody>
</table>
Resources

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards
- Federal Subaward Reporting System
- Financial Management Requirements for Award Recipients
- HHS Grants Policy Statement
- HHS Implementing Regulations—45 CFR Part 75
- HRSA Manage Your Grant
- HRSA Maternal, Infant, and Early Childhood Home Visiting
- Legislative Mandates in Grants Management for FY 2018
- Social Security Act Section 511—MIECHV Legislation
- Sub-Recipient Monitoring for the Affordable Care Act (ACA) Maternal, Infant, and Early Childhood Home Visiting Program—Webinar
- System for Award Management
- Tip Sheet for HRSA Grantees